

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

jordanjaffe@quinnemanuel.com

50 California Street, 22nd Floor

San Francisco, California 94111-4788

Telephone: (415) 875-6600

Facsimile: (415) 875-6700

Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
PLAINTIFF WAYMO LLC'S MOTION
FOR RECONSIDERATION OF ORDER
GRANTING IN PART AND DENYING IN
PART ADMINISTRATIVE MOTION TO
FILE UNDER SEAL (DKT. 2393)**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Plaintiff Waymo LLC’s Motion for
7 Reconsideration of Order Granting in Part and Denying in Part Administrative Motion to File Under
8 Seal (Dkt. 2393) (“Motion for Reconsideration”). The Motion for Reconsideration seeks an order
9 sealing limited portions of exhibits for which the Court denied sealing.

10 3. The portions of Waymo’s Opposition to Uber’s Motion to Compel Production of
11 Documents (previously filed at Dkt. 1048-4) marked in red boxes on page 1 of the sealed version filed
12 concurrently herewith as Exhibit A (in addition to passages previously granted sealing) disclose highly
13 sensitive and confidential information about Waymo’s potential business models as well as its current
14 and potential business and partnership plans. I understand that public disclosure of such specific
15 business strategy information would enable competitors to unfairly tailor their own business strategy
16 based on Waymo’s confidential business strategy and plans, which would cause Waymo significant
17 competitive harm.

18 4. The portions of the July 26, 2017 Deposition Transcript of Jennifer Haroon (previously
19 filed as Exhibit 3 at Dkt. 1048-9) marked in red boxes in the sealed version filed concurrently
20 herewith as Exhibit B (specifically, at deposition pages and lines 108:6,25; 124:1,6, in addition to
21 passages previously granted sealing) disclose highly sensitive and confidential information about its
22 current and potential business models and plans. I understand that public disclosure of such specific
23 business strategy information would enable competitors to unfairly tailor their own business strategy
24 based on Waymo’s confidential business models and plans, which would cause Waymo significant
25 competitive harm.

26 5. The portions of the July 17, 2017 Deposition Transcript of Larry Page (previously filed
27 as Exhibit 1 at Dkt. 1114-2/1068-5) marked in red boxes in the sealed version filed concurrently
28 herewith as Exhibit C (specifically, at deposition pages and lines 97:5,25; 108:19; 183:10; 214:21,25;

1 215:6, in addition to passages previously granted sealing) disclose highly sensitive and confidential
2 information about its potential business models as well as its current and potential business and
3 partnership plans. I understand that public disclosure of such detailed business strategy information
4 would enable competitors to unfairly tailor their own business strategy based on Waymo's
5 confidential business strategy and plans, which would cause Waymo significant competitive harm.

6 6. The portions of the July 24, 2017 and July 25, 2017 Deposition Transcripts of Bryan
7 Salesky (previously filed as Exhibit 4 at Dkt. 1114-5/1068-10) marked in red boxes in the sealed
8 version filed concurrently herewith as Exhibit D (specifically, at deposition pages and lines 145:2;
9 146:2,5; 148:6,12; 151:1,3,7-8; 247:2) disclose highly sensitive and confidential information about its
10 financial valuation as well as its current and potential business and partnership plans, including the
11 confidential identities of third parties involved in those plans. I understand that public disclosure of
12 such detailed business strategy information would enable competitors to unfairly tailor their own
13 business strategy based on Waymo's confidential business strategy and plans, which would cause
14 Waymo significant competitive harm.

15 7. The portions of the document bearing Bates stamp WAYMO-UBER-00026174
16 (previously filed as Exhibit 5 at Dkt. 1068-11) marked in red boxes in the sealed version filed
17 concurrently herewith as Exhibit E disclose the confidential email address of a senior Google
18 executive. I understand that public disclosure of such email addresses would cause Waymo and that
19 executive substantial harm due to the high public profile of this litigation.

20 8. The portions of the document bearing Bates stamps WAYMO-UBER-00008935 to
21 WAYMO-UBER-00008939 (previously filed as Exhibit 4 at Dkt. 1105-4/1080-10) marked in red
22 boxes in the sealed version filed concurrently herewith as Exhibit F (specifically, at pages WAYMO-
23 UBER-00008937 to WAYMO-UBER-00008938) disclose highly sensitive and confidential
24 information about its business plans and policies. I understand that public disclosure of such detailed
25 business strategy information would enable competitors to unfairly tailor their own business strategy
26 based on Waymo's confidential business plans and policies, which would cause Waymo significant
27 competitive harm.

28

